

Ira G. Greenberg
Vincent J. Vitkowsky
EDWARDS ANGELL PALMER & DODGE LLP
Attorneys for Defendants
750 Lexington Avenue, 8th floor
New York, New York 10022
(212) 308-4411

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SEATON INSURANCE COMPANY and
STONEWALL INSURANCE COMPANY,

Plaintiffs,

vs.

CAVELL USA INC. f/k/a KEN RANDALL
AMERICA, INC. f/k/a EASTGATE, INC. and
KEN RANDALL, individually,

Defendants.

Case No. 1:07-CV-07032 (RMB)

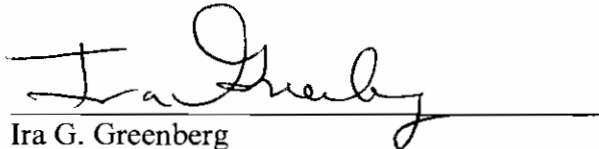
RULE 7.1 STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1 [formerly Local General Rule 1.9] and to enable District Judges and Magistrate Judges of the Court to evaluate possible disqualification or recusal, the undersigned counsel for Defendant Cavell USA Inc. f/k/a Ken Randall America, Inc. f/k/a Eastgate, Inc. ("Cavell US") certifies that the following reflects Cavell US's corporate parents:

- Randall & Quilter Investment Holdings Ltd.
- Cavell America Inc.

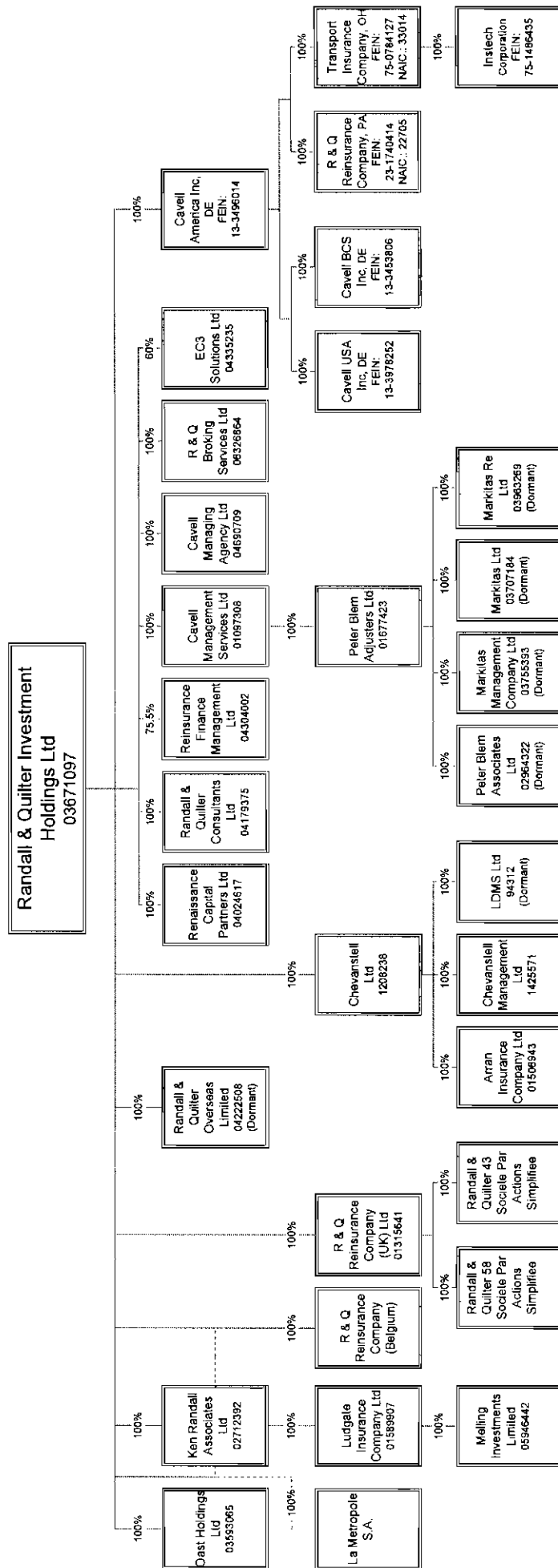
There are no publicly held companies that own 10% or more of Cavell US's stock. A copy of Cavell US's organizational chart is attached hereto as Exhibit A and is incorporated by reference herein.

Dated: New York, NY
October 19, 2007

A handwritten signature in black ink, appearing to read "Ira Greenberg", written over a horizontal line.

Ira G. Greenberg
Vincent J. Vitkowsky
EDWARDS ANGELL PALMER & DODGE LLP
Attorneys For Defendants
750 Lexington Avenue, 8th floor
New York, NY 10022
(212) 308-4411

The Randall Group
Group Structure as at September 12, 2007

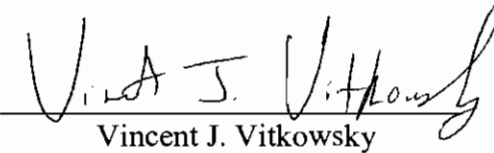


CERTIFICATION

A copy of the foregoing motion, defendant's memorandum of law in support of their motion to dismiss, the Declaration of Pamela S. Hoelsken, dated October 19, 2007 and a Rule 7.1 Statement are being served upon counsel for the plaintiffs via federal express this 19th day of October, 2007:

John F. Finnegan, Esq.
Cadwalader Wickersham &
Taft LLP
One World Financial Center
New York, NY 10281

Shawn L. Kelly, Esq.
Riker, Danzig, Scherer, Hyland & Perretti
LLP
Headquarters Plaza
One Speedwell Avenue
Morristown, New Jersey 07962



Vincent J. Vitkowsky